

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

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ILA LaFRENTZ, JIM LaFRENTZ,  
KATHERINE PORTERFIELD, and  
WILLIAM LaFRENTZ, Individually  
and as Representatives of the  
Estate of JAMES B. LaFRENTZ,

Plaintiffs,

-vs-

Civil Action No.:  
4:18-cv-04229

3M COMPANY, et al.,

Defendants.

- - - - -X

ZOOM VIDEO DEPOSITION OF BARBARA J. HALLSTEIN  
Tuesday, January 12, 2021

Reported by:  
Jeannette McCormick

1 the circumstances that we're discussing here in the  
2 sampling, or is it a different time?

3 A. I remember taking an air sample on  
4 Mr. LaFrentz some time probably within seven years  
5 after I started work there. I cannot attest that  
6 it's this particular case. I don't recall this  
7 particular air sample result that I have here.

8 Q. So I just want to make sure I understood what  
9 you said.

10 Some time possibly within with the first  
11 seven years of you starting there, you do recall  
12 sampling Mr. LaFrentz at some point?

13 A. I do.

14 Q. Do you recall what you were sampling for?

15 A. I don't recall. It was a particulate, but  
16 that's all I remember.

17 Q. You agree that the document you see there,  
18 the contaminant being sampled for was asbestos,  
19 correct?

20 MR. NORCROSS: Objection. It calls for  
21 speculation. She's told you she's not  
22 familiar with the document. If you can  
23 answer, go ahead.

24 THE WITNESS: I did not generate that  
25 document, and I'm not sure who did generate

1           it or who filled it out.

2       BY MR. PEEK:

3           Q.   But taking the document for what it is as it  
4       sits there, that particular document says that  
5       asbestos was the contaminant being sampled for,  
6       correct?

7                   MR. NORCROSS:  Objection.  Calls for  
8       speculation.  She's told you she is not  
9       familiar with the document, Brad.  She didn't  
10      create it.

11                   THE WITNESS:  Yeah, I didn't create this  
12      document.  I'm not actually sure who created  
13      the document, and I haven't seen it until  
14      just recently.

15      BY MR. PEEK:

16           Q.   But you would agree with me that there, the  
17      contaminant, as it is listed, is asbestos,  
18      regardless of where that document came from --

19                   MR. NORCROSS:  Objection.

20           Q.   -- it does actually say asbestos, correct?

21                   MR. NORCROSS:  Objection.  Calls for  
22      speculation, and it's a compound question.  
23      Are you asking her if the document says the  
24      word asbestos on it?  Are you calling -- I'm  
25      not clear, and I don't think she's clear, on

1     **asbestos. That's my recollection.**

2           Q. Did you do any fiber counting?

3           **A. No.**

4           Q. Have you ever done any fiber counting?

5           **A. Not that I remember.**

6           Q. And so your role, tell me -- in the sampling  
7 of asbestos at General Dynamics, explain to me, if  
8 you can, the starting point to the ending point of  
9 your role in developing a report like that and how  
10 you got the information on it.

11          **A. Okay. So --**

12                   MR. NORCROSS: Objection as vague and  
13 ambiguous. If you understand the question,  
14 you can answer it.

15                   THE WITNESS: No. Can you ask me that  
16 again?

17 BY MR. PEEK:

18           Q. I just want to know the detail step-by-step  
19 of your role in the air sampling that was utilized  
20 for someone to develop a report like the one we're  
21 discussing.

22           **A. We would know what we were sampling for, pick**  
23 **an appropriate media, and take an air sample,**  
24 **depending on, you know, different factors or**  
25 **whatever, how long an operation was or whatever;**